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Federal Communications Commission
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FROM: Robert K. Holland
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DATE: February 3, 1999

RE: Formal Public Comment: MM Docket ⁹⁹95-25
(Proposed Licensing of Low Power FM Radio)

This is in response to a request for Public Comments in your Report No. MM 99-1 (January 28, 1999).

I am in favor of establishment of new 100 watt LPFM stations which you have proposed as a secondary service; and the "microradio" class at power levels from 1-10 watts for which you seek comment.

My standing:

- I live in a rural area, Block Island RI; a seasonal resort area 12 miles off the New England coast with an off-season population of under 900. I can speak to the need such a service would fulfill here.
- I have a 30 year resume in broadcasting, including 8 years in radio in Providence, and 7 years programming WTOP (AM) there in Washington. So I understand how radio stations work.
- When filing is invited, I intend to apply for a LPFM license; and I understand that these comments are a separate process.

Why this service is needed:

- I concur with Chairman Kennard's concern that recent industry consolidation has resulted in fewer ownership "voices;" and more imported programming. Radio is less local today than even just several years ago.
- But even before this recent trend, rural areas were under-served. There are already two commercial FM stations licensed to Block Island. One (WERI) operates from mainland Westerly RI, competing for listenership and advertising revenue in the Providence area, and effectively using the island as a transmitter site. The other (WVBI) is being sold to owners of a station in Boston who will air syndicated

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longform programming from Boston. Despite having two FM stations here, the island is still without *its own radio voice*.

- Accordingly, and in the interest of fostering the diversity that is the Commission's intent, I applaud your proposals:
 1. NOT to permit existing commercial broadcaster to own LPFM licenses;
 2. NOT to allow joint marketing agreements; and
 3. To seek a limit on the number of LPFM stations any one licensee can control.

Absent these restrictions, this new service would be abused by consolidation which defeats the service's stated purpose.

I would, however, urge that new 100 and 1-10 watt service should be *commercial*.

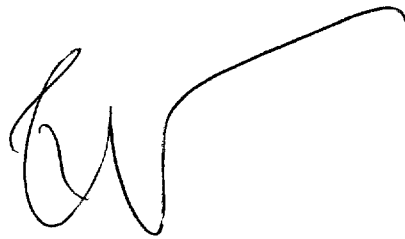
- The Chairman's stated intent that this new service foster diversity would be frustrated by granting only non-commercial licenses. Recent consolidation has resulted in station prices that only the wealthy can afford. LPFM should not be restricted to owners sufficiently affluent to fund a small station's operation out-of-pocket. Indeed *commercial* 100 and 1-10 watt radio stations would be appropriate use of *commercial spectrum*, and offer a wonderful small business opportunity to entrepreneurs otherwise priced-out of radio ownership.
- Similarly, LPFM programming quality would suffer without advertising revenue. If content resources were confined to the public domain, this new class of service would sound more like Citizens Band than FM.
- Notwithstanding protectionist protests already being voiced by existing broadcasters, this new service would not threaten existing radio's commercial viability. It's apples and oranges. Any advertiser for whom LPFM is opportune would be sufficiently small and/or local and/or specialized so as not to be mass-market advertisers. This island, a seasonal resort, is just such a case. No business here advertises on radio on the mainland.

Regarding compliance:

- Having spent much of my career in station management, and thus as a custodian of licensees' responsibilities, I can attest to the benefit of recent years' FCC initiatives to streamline process. And because new LPFM stations will serve such geographically-confined areas, and speak to such specialized interests, the administrative burden of their compliance should, logically, be even less-involved than existing stations.' Operating a 100 watt LPFM station serving Block Island should, as a practical matter, involve lots less paperwork than operating a station with such broad reach as WTOP. The "niche" broadcasters who will operate 1-10 watt service would seem to require even less burden.
- Clearly the most important aspect of spectrum regulation is technical, so interference standards should be established; and comments from others more

technically-oriented than myself will assist you in that area. What "non-techies" like me have to look forward to in operating this new class of service is the efficiency with which state-of-the-art transmitting equipment operates. Hardware now available is sufficiently stable and "newbie-proof" so as to ensure that LPFM operators can easily operate within parameters. And hardware costs for this new class of service will be low enough to empower small businesses otherwise unable to become broadcasters.

Thank you for this opportunity to participate in the process.

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